REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of April 21, 2005 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due.

In paragraph 2 of the Office Action, the Examiner has rejected claims 1, 8, 11, 14 and 17 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,424,976 to Jarvis, *et al.* (hereinafter Jarvis). In paragraphs 3-4 of the Office Action, the Examiner has rejected claims 2-7, 9, 10, 12, 13, 15, 16, 18 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Jarvis in view of U.S. Patent No. 6,302,326 to Symonds, *et al.* (hereinafter Symonds).

Claim 1 has been amended to remove certain recitations formerly found in the preamble of the claim and to place them in the body of the claim so as to more affirmatively emphasize certain features of Applicants' invention. Claims 2-7, which each depend from Claim 1, have been amended for conformity's sake. No new matter has been added by virtue of the amendments.

I. Applicants' Invention

Before addressing the cited references, it may be helpful to reiterate certain aspects of Applicants' invention. Applicants' invention concerns, for example, ways to translate electronic commerce (e-commerce) transaction messages from one data repository syntax to another data repository syntax within a centralized message router.

One embodiment is a routing system for routing data repository messages between a plurality of computer systems. As recited in Claim 1, the routing system can include a

message router in communication with the plurality of computer systems, each of which has a data repository that uses a different syntax. The routing system also can include a conversion engine supported on the message router to translate content in a received data repository message from a syntax corresponding to a data repository of an originating computer system to a syntax corresponding to a data repository of at least one target computer system.

Another embodiment concerns a method of routing data repository messages. The method, as recited in Claim 8, can include receiving a data repository message from an originating computer system, the data repository message conforming to a first syntax. The method also can include determining a target computer system to which the received data repository message is directed. Based on the determined target computer system, a second syntax corresponding to the target computer system can be identified. As expressly claimed, the first syntax is different from the second syntax. The method can further include converting content in the received data repository message from the first syntax to the second syntax, and sending the received and now-converted data repository message to the target computer system.

II. Applicants' Invention Defines Over the Cited References

As noted above, independent Claims 1 and 8, as well as 11, 14 and 17, were rejected under 35 U.S.C. § 102(e) as being anticipated by Jarvis. Jarvis, however, fails to expressly or inherently teach each feature of Applicants' invention.

Jarvis is explicitly directed to a system and method for implementing a "forward compatibility syntax in a directory services environment." (Abstract; Col. 2, lines 40-43.)

Jarvis takes an attribute according to a new syntax that is supported by newer servers but not by older ones, separates data whose "referential integrity" is contextually unimportant, and "recomb[ines] the two types of data according to [the] forward compatibility ('FC') syntax that is supported by both the newer and older servers." (Col. 2, lines 44-52; see also Col. 3, line 62 – Col. 4, line 6.) (Emphasis Supplied.)

Is important to note that with Jarvis each server – the originating server and the one to which the data now converted to the FC syntax is sent – must both understand both syntaxes. It is the originating server, as expressly described in Jarvis, that converts the data into the FC syntax that is commonly understood by both the originating and receiving server. With Jarvis, whenever data is sent by the originating server it is already translated into the FC syntax common to both the originating and receiving server.

Applicants' invention is different. In Applicants' invention, by contrast with Jarvis, the originating computer system sends a data repository message in one syntax to another computer system that understands a different syntax. That is, the syntax of the sent data repository message and the syntax understood by the receiving computer syntax are disparate. The resolution comes with the conversion of the received data repository message from the syntax in which it was sent by the originating computer system into the disparate syntax used by the computer system at which it is received, as recited in each of independent Claims 1, 8, 11, 14, and 17.

It should be noted that with Applicants' invention, the conversion of a data repository message can be effected at a server positioned between an originating computer system and a receiving computer system. (See, e.g., Specification, p. 8, lines 14-24; FIG. 1.) Data repository messages go out from the originating computer system in one syntax and are received at the receiving computer system in a different syntax. This

capability is precluded in Jarvis, since data from newer servers to older ones must go out from the new servers in the FC syntax that is commonly understood by the older ones to which the data is sent.

Accordingly, the actual programming code to accomplish the type of translation used in Jarvis must reside at each of the newer and older devices/servers in the network if each device/server is to be capable of communicating with every one of the other devices/servers. Accordingly, whenever the code is changed, all the devices/servers in the network must be correspondingly upgraded.

With Applicants' invention, by contrast, the originating computer system is not required to know the syntax of a target computer system to which a data repository message is directed. No single computing system in a network, according to Applicants' invention, need know any other syntax other than one it uses. With Applicants' invention, no directory service for operation is required, as with Jarvis. No translation code is needed on any computer system in a network, with Applicants' invention, save for the one specifically dedicated for the job of translating between disparate syntaxes.

Applicants respectfully submit that whereas Jarvis fails to expressly or inherently teach each of the features recited in independent Claims 1, 8, 11, 14, and 17, the prior art fails to provide a basis for rejecting any of these Claims. Moreover, Applicants respectfully submit further, that the prior art likewise fails to provide a basis for rejecting any of dependent Claims 2-7, 9, 10, 12, 13, 15, 16, 18, or 19 since each depends from a patentable claim while reciting additional features.

CONCLUSION

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: July 21, 2005

Gregory A. Nelson, Registration No. 30,577
Richard A. Hinson, Registration No. 47,652
Brian K. Buchheit, Registration No. 52,667
AKERMAN SENTERFITT
Customer No. 40987
Post Office Box 3188
West Palm Beach, FL 33402-3188
Telephone: (561) 653-5000